

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Criminal Case No. 1:18-CR-457 (AJT)
	:	
BIJAN RAFIEKIAN, et al.	:	
	:	
Defendants.	:	

CONSENT MOTION TO RESCHEDULE HEARING

The defendant, Bijan Rafiekian, by his undersigned counsel, moves for an order rescheduling the hearing on the Motion for a Bill of Particulars and the Motion in Support of a September Trial Date, currently scheduled for February 8, 2019, at 2:00 p.m., to February 13, 2019, at 2:00 p.m. The grounds for this motion are as follows:

1. The hearing on the Motion for a Bill of Particulars and the Motion to Set a Trial Date was originally scheduled for February 7, 2019. After the original trial date of February 11, 2019 was vacated on January 22, 2019, undersigned counsel, Robert Trout, scheduled a personal vacation and purchased an airline ticket to depart the morning of February 8, 2019, and to return February 12, 2019. That vacation would not conflict with any matters then pending in this case.

2. On January 30, 2019, this Court rescheduled the hearing from February 7, 2019, to February 8, 2019, at 2:00 p.m., a date and time that conflicts with the previously scheduled vacation of undersigned counsel.

3. Undersigned counsel is advised that the Court is available to hear the Motion for a Bill of Particulars and the Motion to Set a September Trial Date on February 13, 2019, at 2:00

p.m. Counsel for the government has advised that they are available at that time and that they consent to this motion.

WHEREFORE, defendant requests that the February 8, 2019 hearing be rescheduled to February 13, 2019, at 2:00 p.m.

Respectfully submitted,

/s/

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/s/

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CERTIFICATE OF SERVICE

I hereby certify that, on this 1st day of February, 2019, a true and genuine copy of Consent Motion to Reschedule Hearing was sent via electronic mail by the Court's CM/ECF system to the following:

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/s/_____
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